

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO**

VOTER REFERENCE FOUNDATION,)	
LLC and HOLLY STEINBERG)	CASE NO: 1:22-cv-00222-JB-KK
)	
Plaintiffs,)	
v.)	
)	
)	JOINT STIPULATIONS
HECTOR BALDERAS , in his official)	
capacity as New Mexico Attorney General, and)	
MAGGIE TOULOUSE OLIVER , in her)	
Official capacity as New Mexico)	
Secretary of State,)	
)	
Defendants.)	

**JOINT STIPULATIONS FOR MAY 17, 2022 HEARING ON
PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION**

COME NOW Plaintiffs Voter Reference Foundation, LLC (“VRF”) and Holly Steinberg and Defendants Secretary of State Maggie Toulouse Oliver and Attorney General Hector Balderas (collectively, the “Parties”), by and through counsel, and stipulate to the following facts:

1. On March 29, 2021, the Secretary of State’s Office received a request for voter information listing David Michael Lippert and Local Labs under “Information of Requestor.”. Lauren Hutchison, a Compliance Officer in the Secretary of State’s Office, processed the request.
2. In conjunction with that request, Mike Lippert executed an affidavit required by NMSA 1978, Section 1-4-5.5(C) and the Secretary of State’s Office for such requests, a true and correct copy of which is attached hereto as Exhibit A.

3. In conjunction with that request, a payment was made to the Secretary of State's Office in the amount of \$5,378.12. A true and correct copy of the payment receipt is attached hereto as Exhibit B.

4. The Voter Information Authorization form executed by Mike Lippert (Exhibit A) indicated that the voter information was being requested for election related purposes.

5. Mike Lippert did not make any representations to the Secretary of State's Office regarding the use or sharing of the requested voter data other than what was included on the form affidavit he signed. See Exhibit A.

6. The Secretary of State's Office sent a referral to the Attorney General's Office on or about December 20, 2021 regarding Local Labs and VRF. A true and correct copy of the referral is attached as Exhibit C.

7. The statements attributed to Secretary of State Toulouse Oliver in the ProPublica article were made by her. A true and correct copy of that article is attached hereto as Exhibit D.

8. The statements attributed to VRF or its agents or employees in the ProPublica article (Exhibit D) were authorized by VRF to be made on its behalf.

9. The Tweets made from the Office of the Secretary of State's Twitter account (@NMSecOfState) attached hereto as Exhibit E were authorized by the Secretary to be made on behalf of the Secretary of State's Office.

10. The posts made from the Office of the Secretary of State's Facebook account (Office of the new Mexico Secretary of State; facebook.com/NMSecOfState) attached hereto as Exhibit F were authorized by the Secretary to be made on behalf of the Secretary of State's Office.

11. The press release attached hereto as Exhibit G was authorized by the Secretary of State to be made on behalf of the Secretary of State's Office.

12. The version of the Voter Information Authorization form preceding the one executed by Mike Lippert (Exhibit A) is attached hereto as Exhibit H.

13. The version of the Voter Information Authorization form executed by Mike Lippert (Exhibit A) was created by the Secretary of State's Office on or about January 25, 2021.

14. The next successive version of the Voter Information Authorization form was created by the Secretary of State's Office on or about February 10, 2022 and is attached hereto as Exhibit I.

15. The most recent version of the Voter Information Authorization form was created by the Secretary of State's Office on or about February 14, 2022 and is attached hereto as Exhibit J.

16. A true and correct copy of the list of all persons and entities who have submitted a Voter Information Authorization form to the Secretary of State's Office from January 1, 2021 to April 29, 2022 is attached hereto as Exhibit K.

17. The person at the Secretary of State's Office who found out that Local Labs and VRF are connected is Lauren Hutchison. Her inquiry was prompted by information the Office learned during a media inquiry by ProPublica in December 2021.

18. The Secretary of State's Office has made a second referral to the Attorney General's Office in 2022 relating to voter data. A true and correct copy of that referral is attached hereto as Exhibit L.

19. The Parties stipulate to the authenticity and admissibility of the documents attached hereto as Exhibits A-L, except with respect to Exhibit D, a news article, the Parties stipulate only to the admissibility of the statements of the Parties or their agents or employees set forth within

that article. Each Party reserves the right to argue that appropriate weight should be given to the documents subject to this stipulation.

Respectfully submitted this 17th day of May 2022.

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